

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

VINSON & ELKINS LLP

Steven M. Abramowitz (No. 043641990)
The Grace Building
1114 Avenue of the Americas, 32nd Floor
New York, New York 10036-7708
Tel: (212) 237-0000
Fax: (212) 237-0100
Email: sabramowitz@velaw.com

Counsel for Ad Hoc Group of Customers of Powin, LLC

In re:

Powin, LLC, *et al.*,¹

Debtors.

Case No. 25 – 16137 (MBK)

Chapter 11

(Jointly Administered)

APPLICATION FOR ADMISSION
PRO HAC VICE OF MATTHEW W. MORAN, ESQ.

An ad hoc group of Powin customers, whose members are Lone Star Solar, LLC, Idaho Power Company, West Warwick Energy Storage 1, LLC, West Warwick Energy Storage 2, LLC, and West Warwick Energy Storage 3, LLC (collectively, the “*Ad Hoc Customer Group*”), by and through their undersigned counsel, Vinson & Elkins, LLP, respectfully makes this application (the “*Application*”) for *pro hac vice* admission of Matthew W. Moran, Esq., and represents as follows:

1. Mr. Moran is a partner at the firm of Vinson & Elkins LLP, which maintains offices at, among other places, 2001 Ross Avenue, Suite 3900, Dallas, Texas 75201. Because of his

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: (i) Powin, LLC [0504], (ii) PEOS Holdings, LLC [5476], (iii) Powin Project LLC [1583], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487]. The Debtors’ mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

familiarity with the facts and circumstances relevant to the above-captioned pending matter, the Ad Hoc Customer Group requests that Mr. Moran be allowed to appear *pro hac vice* for the purposes of representing the Ad Hoc Customer Group in connection with these chapter 11 cases.

2. As set forth in the accompanying Declaration of Matthew W. Moran, Esq., Mr. Moran is a member in good standing of the bar of the State of Texas. Mr. Moran is not under suspension or disbarment by any court.

3. If admitted *pro hac vice*, Mr. Moran has represented that he will adhere to the disciplinary jurisdiction of this Court. Mr. Moran also has represented that he will arrange with the New Jersey Lawyer's Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit Matthew W. Moran, Esq. *pro hac vice* in the above-captioned matter.

Dated: August 5, 2025
New York, New York

Respectfully submitted,

/s/ Steven M. Abramowitz

VINSON & ELKINS LLP

Steven M. Abramowitz, Esq.

1114 Avenue of the Americas, 32nd Floor

New York, NY 10036

Telephone: (212) 237-0137

Sabramowitz@velaw.com

*Counsel for the Ad Hoc Group
of Customers of Powin, LLC*